



26 July 2023

Subject:

Call for urgent dialogue regarding CLP Revision and impact on industry and environment

To whom it may concern,

We, the signatories of 8 European associations representing producers, product formulators (downstream users), distributors and end users of chemicals, would like to express our strong concern regarding the ongoing negotiations for the revision of the Regulation on Classification, Labelling and Packaging of substances and mixtures (CLP). While we acknowledge the importance of ensuring clear and concise information on product labels, we firmly believe that the impact of the revised CLP regulation has been underestimated or inadvertently overlooked in the Commission's impact assessment. **We would like to bring your attention to the proposed requirement of a minimum font size of 1.4mm x-height for products under 3L, applying different font sizes to different capacities, label update timelines of 6 months, and ban on environmental claims for any CLP labelled product.**

With regard to **font size on labels**, we generally follow [ECHA guidance of 1.2mm x-height](#) as the minimum font size for most of our products, as this has been proven to be easily readable. This enables producers to use multiple languages on packs, allowing us to optimise sales and logistics and avoid the needless destruction of products at the end of their expiration date. An increase in font size will lead to more Stock Keeping Units (**SKUs**) due to fewer languages on packs, larger labels, and perhaps even larger packaging formats, in direct conflict with the Packaging and Packaging Waste Regulation (**PPWR**) objective to minimise packaging. This will also lead to more packaging, redundant equipment, more energy used in production, storage, transport, and, as mentioned, the destruction of products, all of which will lead to more unnecessary waste.

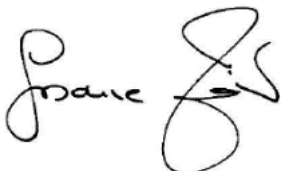
Tangentially, the new **6-month timeline for label updates** linked to an additional or increased self-classification (**Article 30**) will have a massive impact across industries, given the timeframes of a typical label change. The current requirement is to update labels without undue delay: in the case of certain labelling techniques, this may take up to 18 months due to the complexity of the process and the required communication up and down the supply chain. Indeed 18 months is the normal transition period provided in Adaptation to Technical Progress (ATP)s to CLP for harmonised classifications to become mandatory. **In our opinion, there is no justification for inconsistency with other label updates.** A timeline as short as 6 months will be almost impossible to meet for product redesign/rework/relabel across the supply chain and would create scrappage and unnecessary transport of goods, which contradicts the objectives of the Green Deal.

Finally, the tabled amendment within the European Parliament to **prohibit the use of environmental claims on products** that are classified or carry supplemental labelling is very problematic. Firstly, it goes far beyond the scope of CLP, which is purely focused on the hazard classification, labelling and packaging of chemicals. Secondly, the topic of environmental claims is addressed already by the 'Circular Economy Action Plan', particularly covered by the 'Green Claims' Directive. Therefore, we caution the EU institutions against regulating issues related to environmental claims in chemical legislation, such as CLP. It is essential that environmental claims and packaging sustainability rules are regulated via their specific legislation to ensure legal certainty and coherence.

Our industries, ranging from "downstream" industries such as detergents, aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, cosmetics disinfectants, lubricants, and chemical distributors, to DIY Retail and home improvement, retail and wholesale, and flexible packaging manufacturers, are providing millions of jobs across Europe, and supply products, which play a crucial role throughout the European economy. Many of these products are used every day by EU consumers in varying applications and functions.

We therefore urgently request substantial dialogue to minimise the negative impacts that the current proposals will have on the EU industries and operations while reinforcing the CLP through our efforts.

Yours sincerely,



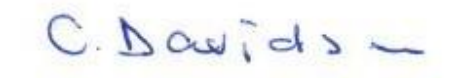
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